



Horizon Organic Dairy, Inc.
P.O. Box 17577
Boulder, CO 80308-7577
6311 Horizon Lane
Longmont, CO 80503
Phone: 303-530-2711
Fax: 303-530-6934

From ORGANIC FARMS Using NO ANTIBIOTICS, NO HORMONES and NO PESTICIDES

Good Morning.

On behalf of Horizon Organic Dairy, I very much appreciate the opportunity to submit comments on the NOSB livestock committee's recommendation concerning livestock confinement, in particular the requirement of managed pasture for ruminant animals.

Horizon Organic Dairy is the leading marketer of organic milk with a 67% share (December 1998 A.C. Nielsen data) nationwide. Our products can be found in over 10,000 stores. We purchase milk from organic dairy pools that represent over 200 farmers. In addition, we manage two of our own farms – a 500-cow dairy on 580 acres in Maryland and a 4000-acre dairy in Idaho where we milk 3500 cows.

All of the organic farms producing our milk or from which we obtain milk use pasture for cows at some time during the year, depending on the stage of production, season, regional climate, weather, etc. Even on our large farm in Idaho, which is located on high-altitude desert with only 6" of precipitation per year and an altitude of 3500 feet, our dry cows are placed and rested on pasture during the spring through mid-summer. Our land is fragile there and needs abundant irrigation water for crops to grow. However, when water and compost are available we can grow some of the best dairy feed in the country. The deep volcanic-based soil is loaded with trace minerals. The cool nighttime temperatures are just right for setting high-protein alfalfa hay.

We have developed an organic system in southern Idaho that is not limited to our 4000 acres but also includes over 60,000 certified organic acres tended by Idaho farmers who are located within 2 hours drive of our farm. None of these farms were organic when we started Horizon six years ago. We now grow approximately one third of our own Idaho feed – mostly corn and barley/pea silage with a small amount of hay. The remaining 16,000 to 18,000 tons of hay, 12,000 tons of barley and wheat, 10,000 tons of organic protein (flax, canola, sunflower or cottonseed meal by-products from processing plants or cotton gins) are brought on to the farm.

At Horizon we compost all of our manure and bedding waste (using organic straw from the barley and wheat farmers). Today, if you visited, you would see that we have approximately 30 acres of compost windrows waiting to be spread on our fields or loaded on trucks going back to our feed suppliers and their land. We are proud of the "regional" nutrient recycling system we have implemented. At our Maryland farm on the Eastern Shore, we bought a run-down, environmentally disastrous dairy farm. We are reclaiming the land by utilizing crops that are heavy up-takers of the excessive high soil levels of nitrates and phosphorus; by employing proper rotation and tillage techniques; by rebuilding fragile wetlands; and by working with the local farm extension agents to demonstrate to other producers how organic production practices can rebuild their soils.

Our dairies in Idaho and Maryland are catalysts for keeping farmers on their land and converting significant acreage to organic products. The agricultural communities in both states have closely monitored our success and are now collaborating with us to encourage and assist other producers to begin the conversion to organic.

Both of our farms are certified organic in accordance with OFPA and to the final livestock recommendations of NOSB published after the November 1995 meeting in Austin, Texas. I attended each of the four livestock hearings and listened to all the testimony that forms the basis of the 1995 recommendations. We at Horizon crafted our organic dairy farm systems to exceed these recommendations. In fact, we have argued from the beginning against the use of antibiotics except to save an animal's life. We have always opposed the provision for non-organic feed variances in transitioning herds.

In our response to the USDA's request for comment on confinement, we have presented arguments opposing the absolute requirement for pasture. We did not do this because of hubris or arrogance or ignorance, as you will see by studying the letters we previously submitted. These papers are available as part of the public record.

We are proud to say that the health and productivity of our two dairy herds is exemplary compared to conventional dairy farmers in our regions. We have lower cull rates, lower incidence of mastitis, and better pregnancy rates. Without the use of rBST, our productivity is equal to the best dairy farms in the country. And very importantly, the quality of milk based on somatic cell count and coliform or standard plate count is better than average.

We have an animal husbandry program that is based on careful monitoring of individual cows and prevention rather than intervention. Our 'early sick cow recognition' program catches problems earlier so we can treat the cows with simple natural methods. We milk three times a day, instead of two, to reduce stress on the udder and to have more opportunities to monitor cows' conditions. We employ a nutritionist and veterinarian who carefully adjust feed rations for stage of production, breeding, pregnancy, age, season and other factors.

We believe that we have established an organic dairy system which is sustainable, have continually improved the biodiversity on our farms and in the surrounding regions; are keeping farmers on the land; are converting thousands of acres to organic production; are recycling nutrients successfully throughout a watershed; are producing healthy productive animals in a humane manner; and are providing the American consumer dairy products that are superior to conventional. All of this is done with very little access to pasture.

We strongly suggest that the NOSB amend the requirement for managed pasture to read "recommend" or "encourage" or should instead of "shall" or "require." At Horizon we believe that the NOSB would limit the organic conversion of conventional dairy farmers by requiring pasture. Horizon has consistently and vigorously fought for the highest standards. We have followed the letter of the law and have held ourselves to even higher standards. Now we feel that NOSB's livestock committee is redefining the playing field to limit the entry into organic dairy. We ask you to reconsider your recommendation and recognize that managed pasture is only one element in a very complex system. We need to leave the door open to new ideas and methods if we are to see our vision of significant amounts of American agriculture eventually converting to organic become reality.

Thank you for allowing the time to present our views.